

CGB-CC-0540

Commission's Secretary  
Office of the Secretary  
Federal Communications Commission  
Attention: CGB Room 3-B431

June 12, 2006

445 12th Street, SW  
Washington, DC 20554

Re: Exemption from closed captioning due to undue burden

Commission's Secretary,

Makai Ohana productions is a husband and wife video production company located in Southern Oregon. We have been in business for 2 ½ years. We will begin to produce a 30 minute show featuring local people, places and products of Oregon called Oregon Lifestyles. The show will be updated weekly. We are a non-news program and have no access to captioning equipment. We are of local interest as we show people hiking trails, outdoor activities, local businesses and area artists and musicians. We have investigated the cost of captioning and have found it to be too expensive for our show. Also much of our show is beautiful scenery placed to music with little or no dialogue. Titles are placed on the lower third of the screen to inform viewers about trail heads and other pertinent info.

Details:

The show has a per episode income of \$750 with a max potential of \$900. Cost for producing the show ranges from \$200-\$400 per episode. Production hours to produce the show are no less than 40 hours per week, I will have very little time to work on other projects to generate additional income. Captioning services would be at least \$250-\$400 (see attached quotes).

I also looked into purchasing the equipment and the cost would be at least \$8,000. (see attached pricing).

We barely make a profit now from the show and the additional cost would make it impossible to produce the show.

Our video production company only grossed \$55,000 in the year 2005 from a total of all our projects (shooting wedding videos, advertising clients etc.)

If we are able to increase our income in the next few years we would love to have our programming closed captioned and are very interested in purchasing the equipment to be able to do it ourselves, and possibly provide the service to others. At this time however it would be impossible to do so.

Please consider Oregon Lifestyles a worth while community project to be exempt from closed captioning requirements at this time.

Thank you,

  
Tony Kalhagen  
Producer / director  
Terri-Lynn Kalhagen  
Executive producer  
Makai Ohana productions  
P.O. Box #1  
Ophir, Oregon 97464  
541-247-0625



# VIDEO CAPTION CORPORATION

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26 Highland Way • Stanfordsville, New York 12581 • Tel: 800-705-1203 • Fax: 518-880-1203

DATE: June 8, 2006  
TO: Tony Kalhagen  
FROM: Justin K. Macedonia / Video Caption Corporation  
RE: Closed Captioning Proposal

Dear Tony,

It was a pleasure speaking with you and having the opportunity to discuss close captioning your show. Video Caption Corporation very much appreciates the opportunity to submit this proposal to caption your program.

As we discussed, Video Caption Corporation is a full service captioning communications firm specializing in offline captioning services for broadcasters, corporations, independent producers, schools, libraries, churches, and government agencies.

We would propose to close caption the following programs at the discounted rates set forth below. ***Reduced rates reflect discounts for volume.***

| <b><u>Program Titles</u></b>     | <b><u># Shows / Length</u></b> |
|----------------------------------|--------------------------------|
| Weekly Ecotourism Adventure Show | 52 half hour shows             |
| <b>Total number of shows</b>     | <b>52</b>                      |

**Pricing**

**Roll-up Captioning (72 Hour Turnaround).....\$200 / 30 minutes**

**Tape Stock (BetaSP).....\$20 / 30 minutes**

**Transcription.....Included**  
*d*

**Caption**  
**Encoding.....Included**

**Format Conversion (MiniDV to BetaSP).....Included**

Tony, we will always do our very best to make this process as easy and affordable as we can. If you have any questions or concerns, please do not hesitate to contact me at any time. I am certain we can develop a partnership that is mutually beneficial.

Thank you for your time and your consideration of our proposal. We look forward to working with you.

**Contact Information**

I am available if you have any questions about this proposal. Please contact me anytime.

Telephone: (800) 705-1203  
Facsimile: (845) 868-1188  
Email: [jkmacedonia@vicaps.com](mailto:jkmacedonia@vicaps.com)  
Website: [www.vicaps.com](http://www.vicaps.com)

Justin K. Macedonia  
Video Caption Corporation

## Main Identity

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**From:** "Alexandria Briare" <abriare@visualdatainc.com>  
**To:** "Tony Kalhagen" <kalhagen@charter.net>  
**Sent:** Monday, June 12, 2006 8:26 AM  
**Subject:** RE: closed captioning quote

Good afternoon Tony,

I'm sorry that I was unable to answer your call earlier. I've been out of town for the past several days. I began returning calls and I didn't see your email...sorry about that..so you have a message on your machine..you're too quick..lol!

You mentioned you have a 30:00 show that you need closed captioned. We can certainly help you with your Closed Captioning (CC) needs. We will take your 30:00 show, CC with Roll-Up Captioning and create you a new CC BCSP master.

The cost to create you a CC BCSP Submaster:

### **30:00 Roll-Up Closed-Captioning \***

#### **Encoding onto BCSP**

#### **BCSP NTSC CC master**

**Total for all the above - \$250.00 total (there are no hidden charges)**

**If you prefer Pop-On Captioning, we can do that for the 'all inclusive' price of \$395.00 per 30:00 show**

\*Includes transcription

Our normal turnaround time for a 30:00 show is 3-4 days. If you're in a tight crunch, we'll try and get it done sooner, but we normally like 3-4 days.

Tony, we would love to work with you on your show...I do hope to hear back from you. Please let me know if there is anything I've left off, I would be more than happy to go over this with you as well.

Again, I look forward to hearing back from you ...

Kindly,

Alexandria

Alexandria Briare  
VP of Sales  
**Visual Data Media Services, Inc.**  
145 West Magnolia Blvd.  
Burbank, CA 91502  
818-558-3363 (office)  
818-845-2550 (fax)  
[www.visualdatainc.com](http://www.visualdatainc.com)



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**From:** Tony Kalhagen [mailto:kalhagen@charter.net]  
**Sent:** Friday, June 09, 2006 11:46 AM  
**To:** abriare@visualdatainc.com  
**Subject:** closed captioning quote

Hello Alexandra,

Thank you for the call back... here are the details

We produce a 30 minute show (about 25 min) that needs closed captioning. Can you please give me info

- what format I will send to you (mpeg, avi files on disc) minidv tape?
- turn around time
- Cost
- can you convert to beta sp?

It is a weekly updated show so I will need to send in episodes about two weeks prior to air dat.

Thank you for your reply,

Tony Kalhagen  
Makai Ohana Productions  
541-247-0625  
Oregon Coast

6/12/2006



Computer Prompting and Captioning Co.

1.800.977.6678 | info

- Home
- Captioning**
- Software
- Hardware
- Systems & Prices
- Gov't Regulations
- Section 508
- Customer Support
- Downloads
- FAQs/Articles
- Services
- Teleprompting
- Subtitling
- DVD
- Webtv
- V-Chip
- Webcasting
- Services

Home | Captioning | Software

> Post-Production (Offline) | Realtime (Online).

- |                          |                         |
|--------------------------|-------------------------|
| CaptionMaker CPC-500     | CCaption-DV             |
| CaptionMaker CPC-600/700 | CCaption-NLE            |
| CaptionMaker CPC-700NL   | MacCaption-DV           |
| CaptionMaker CPC-700NLE  | MacCaption-NLE/Mpeg     |
| CaptionMaker CPC-710     | MacCaption-NLE/Mpeg/Sub |

**Printer-Friendly Brochure**   **Printer-Friendly Brochure**

**How Does the CPC-700NLE CaptionMaker Work?**

**(Play & encode digital video files directly on the hard drive)..**

With the CPC-700NLE (includes patented [#6,895,166] software engine) you can caption and subtitle your digital videos without losing a generation. No need for any hardware caption encoder or subtitle character generator. Click here to see more details.

With CPC-700NLE CaptionMaker software you can position, time code, and generate closed captions and subtitles without using any hardware caption encoder or subtitle character generator. The result is better video quality without going down a generation, plus it saves you the expense of purchasing any additional hardware, like closed caption encoder and time code reader.

Subtitles can be added in any language using any TrueType font. You can now subtitle any digital video just using your notebook computer and nothing else!

CPC-700NLE can play back many types of video files, Mpeg, DV, AVI, WMV, RP, QT in its preview window. It can caption a DV and Mpeg2 video directly. It can also add captions to an uncompressed video residing in an NLE system. No need for a closed caption encoder hardware.

- DV and Mpeg2 Video
  - Video Residing in an NLE System
  - Retrieve Captions from DV or Mpeg2
  - Hardware Requirement for DV
  - Hardware Requirement for NLE
  - DVD using a DVD Authoring System
  - Webcast in WMP, RP, QT and Flash
  - Subtitling Digital Video File
- Click here to see how to transcribe, format and time stamp the script.
- 
- Click here for Screenshots

Click here to demo CPC-700NLE from start to finish

**Software at**

- Comparison of CPC-500/600/700
- How CPC-500 wo
- How CPC-600/700
- How CPC-700NL
- How CPC-710 wo
- System requireme
- Software Prices
- Hardware Prices
- Systems and Price
- Ask the Customer
- Our Awards

**Software Prices**

**CPC-700NL:** Sc and Encoding fr and Video Tape **\$5,995**

**CPC-700:** Script and Encoding fr only (time code) **\$4,9**

**CPC-600:** Script and Encoding fr Only (non time code)

**CPC-500:** Realti using Speech R: **\$1,995**

**CPC-710:** Encod with hardware C **\$995**

**Software Encod** (No generatio **CCaption-DV -!** **CCaption-NLE** (When purchase or CPC-700NL c preparation soft Click here for de

**Apple Mac Sc** **CCaption/Mac!** (No generatio encoding capti

## Inserting Closed Captions to Video Using an NLE System

CaptionMaker for NLE systems works by putting a 2-D visual representation of the appropriate closed caption commands into a QuickTime or AVI movie. This movie file is then imported into a non-linear computer editing system and put on the editing system time line exactly like other video material. A picture-in-picture effect or a crop effect is then applied to the imported movie to mask off all but the closed caption image lines, and the NLE system is used to merge the imported movie with video program material. The resulting video output from the NLE system is closed captioned. Using this method, no additional encoder is needed to produce closed captioned video.

This method requires the NLE system to be able to display a line from the visual picture area into line 21 of the television signal vertical blanking interval (VBI). Video editing hardware from Avid, Media 100, Matrox and Pinnacle Systems, among others, supports this capability.

For details on compatible NLE hardware, [click here](#).

[Click here](#) to find out compatibility with your NLE system and how to get the location of closed caption data on your 720x486 video for your NLE system.

## Inserting Closed Captions to DV

CaptionMaker inserts closed captions directly into the video data area. When a closed caption encoded DV video data file is transferred to a DV tape, the closed caption data is transferred to Line 21 of NTSC video. Using a laptop computer with an IEEE 1394 / FireWire interface you can add closed captions to DV video material.

For details on compatible hardware for DV video, [click here](#).  
For sample DV and Mpeg video with captions, [click here](#).

## Inserting Closed Captions to Mpeg2

CPC-700NLE can add captions to the data area of Mpeg2 video too. You can store the video on your video data server, transmit the video to a different location. Captions are going to stay in the data area.

When needed just dump the video on a tape format using one of the Mpeg2 decoder like VBrick VBStar, captions data are going to be converted to Line 21 of NTSC video.

When a closed caption encoded Mpeg2 video data file is copied to a DVD, you get a closed captioned DVD.

## Retrieving captions from DV or Mpeg2 video

If you have a DV or Mpeg2 video with closed captions, simply drag the video to the preview windows and CPC-700NLE will retrieve all the captions with the positional information and timecodes.

## Sample Digital Videos with Captions

[Click here](#) for the following sample videos

- DV and Mpeg video with captions

## A Few Sample :

below are a few prices. Visit our Prices for a com and description ( available system

**Closed Caption (Analog - Comp CPC-700, Insert encoder, a time and a video disp \$7,435**

**Closed Caption (D1) CPC-700, Li serial digital enc code card and a device \$8,690**

**Open Captionir (Analog - Comp CPC-600, EEG l and a video disp \$4,095**

## What else can y

**Retrieve captio**  
time code and p  
information auto  
previously captio  
using low cost h  
can then use the  
do the following:  
» Generate a **D**  
subtitle files  
» Generate a **W**  
file  
» **Reinsert capt**  
compressed vid  
often used in tel  
» **Reinsert capt**  
newly edited ver  
that had been pr  
captioned

**Webcast captio**  
You can caption  
videos on the W  
CPC-700NL. To  
existing video, w  
as a Video-on-D  
Webcast, the pr  
same as that de

- Black 720x486 video with captions
- NLE 720x486 black video with captions as mov and AVI
- Calibration video for NLE systems as mov and AVI

**Subtitling Digital Video File**

Subtitles can be added in any language using any Windows TrueType font. You do not need any additional character generator hardware. You can now subtitle any digital video just using your notebook computer and nothing else!

**DVD Captioning & Subtitling**

To caption or subtitle a DVD, you need a DVD authoring system in addition to the CPC-700NL software. CaptionMaker can export appropriate caption/subtitle files the file is exported to your DVD authoring system, which then inserts captions or subtitles onto the DVD. The CPC-700NL supports all major DVD authoring systems. You do not need a closed caption encoder or a character generator.

**Webcast Captioning**

You can caption both existing videos and live productions on the Web with the CPC-700NL. To caption an existing video, which is known as a Video-on-Demand Webcast, the process is the same as that described earlier up to the point of AutoSync. Instead of AutoSync, the CaptionMaker exports a caption file for your Webcast. The CaptionMaker can create files for all three video players: Windows Media Player, RealPlayer, QuickTime and Flash.

To try out and to see how these functions work, [click here](#).

For NLE Hardware compatible with CPC-700NLE, [click here](#).

**Software Prices**

**Original**

| Software     | Price   |
|--------------|---------|
| CPC-700 NLE  | \$7,995 |
| CPC-700 NL   | \$5,995 |
| CPC-700      | \$4,995 |
| CPC-600      | \$2,995 |
| CPC-500      | \$1,995 |
| CPC-710      | \$995   |
| CCaption-DV  | \$995   |
| CCaption-NLE | \$1,995 |

**Upgrades**

| Software (Within Windows)       | Price   |
|---------------------------------|---------|
| CPC-700NLE-UWW (from CPC-700)   | \$2,995 |
| CPC-700NLE-UWW (from CPC-700NL) | \$1,995 |
| CPC-700NL-UWW (from CPC-700)    | \$995   |

up to the point of  
Instead of AutoSync  
CaptionMaker exports  
file for your Web  
CaptionMaker can  
for all three video  
Windows Media  
RealPlayer and

For captioning a  
[click here](#).  
For a sample and  
a live webcast, [click here](#).

DVD Captioning  
also be done in  
minutes using a  
stamped caption  
import  
a time stamped  
CaptionMaker or  
other captioning  
then export the  
of any major DV  
system.

V-Chip ratings can  
while captioning  
also added to a  
existing captions  
can be changed  
second to reflect  
program content

WebTV Crossover  
also be added w  
a video, and ad  
with existing cap

**Why CPC is the Smart Choice**

"The software is  
friendly. We were  
day we received  
Kevin Reeve  
Utah State Univ

"With our CPC  
software we don  
have the expens  
service, nor do v  
for them to get it  
can do it ourselv  
done in-house, f  
and in much less